ESTTA Tracking number:

ESTTA753182

Filing date:

06/17/2016

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91227377
Party	Defendant Artisans Ales Limited Partnership
Correspondence Address	TANYA M REITZEL COASTAL TRADEMARK SERVICES 1081 CAMBIE STREET VANCOUVER, BC V6B5L7 CANADA info@coastalip.com
Submission	Motion to Extend
Filer's Name	Michael Heilbronner
Filer's e-mail	mheilbronner@idealegal.com
Signature	/Michael Heilbronner/
Date	06/17/2016
Attachments	Motion to Extend Time for Answer and Other Deadlines Yale v Artisans Ales.pdf(112182 bytes) Declaration of Michael Heilbronner Yale v Artisans Ales Limited Partner- ship.pdf(84897 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

YALE UNIVERSITY,

Opposer

٧.

Opposition No. 91227377

Serial No. 86336817
Mark: OLD YALE BREWING CO.

ARTISANS ALES LIMITED PARTNERSHIP,
Applicant

Motion for 30-day Extension of Time to File Answer and of All Other Deadlines

Applicant, Artisans Ales Limited Partnership, hereby respectfully moves to extend by **30 days** the time for it to file an Answer to the Notice of Opposition and all other deadlines in the Opposition.

Applicant is a Canadian entity that only recently engaged counsel in the U.S. to address this matter. *See* Accompanying Declaration of Michael Heilbronner ¶ 1 ("Heilbronner Dec."). Applicant's counsel needs and requests this extension to have time to investigate the claim, work with Applicant to evaluate Opposer's factual allegations, and file an appropriate responsive pleading. *Id.* ¶ 4.

Counsel for Applicant has corresponded with counsel for Opposer about a stipulation for an extension of time to file an Answer. Counsel for Opposer has replied to one of Applicant's counsel's emails, but counsel for Opposer has not indicated whether Opposer is willing to stipulate to an extension. *Id.* ¶¶ 2-3.

For the foregoing reasons, Applicant respectfully contends that the relevant factors weigh in favor of the Board granting this Motion and issuing a revised scheduling order.

Respectfully submitted,

June 17, 2016

Michael K. Heilbronner

Michael Keilbronne

MHeilbronner@IdeaLegal.com IdeaLegal, P.C. 1631 NE Broadway; No. 443

Portland, OR 97232

Telephone: (503) 449-9084

Attorney for Applicant

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Motion for 30-day Extension of Time to File Answer and of All Other Deadlines on:

CHRISTINA M LICURSI WOLF GREENFIELD & SACKS PC 600 ATLANTIC AVENUE BOSTON, MA 02210

by causing a full, true, and correct copy thereof, addressed to the last-known office address of the attorney or registered agent, to be sent by mailing in a sealed, first-class postage-prepaid envelope and deposited with the United States Postal Service at Portland, Oregon.

DATED: June 17, 2016

Michael Heilbronner

Telephone: (503) 449-9084

Michael Keilbronne

Fax: (503) 914-0301

MHeilbronner@IdeaLegal.com

Attorney for Applicant

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

YALE UNIVERSITY,

Opposer

Opposition No. 91227377

٧.

Serial No. 86336817 Mark: OLD YALE BREWING CO.

ARTISANS ALES LIMITED PARTNERSHIP,
Applicant

Declaration of Michael Heilbronner

I, Michael Heilbronner, declare that:

- 1. I was recently engaged as U.S. counsel of record for Applicant, Artisans Ales Limited Partnership ("Applicant").
- 2. I have contacted and corresponded with counsel for Opposer regarding the possibility of settlement. I also have twice requested that Opposer consent to an extension of time to file an Answer.
- 3. Counsel for Opposer has replied to one of my emails but has not indicated whether Opposer is willing to stipulate to an extension of time for Applicant to file an Answer.
- 4. To properly evaluate the many factual allegations in the Notice of Opposition and prepare and file a suitable Answer, I need additional time to consult with Applicant.
- 5. The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. §1001, and that such willful false statements may jeopardize the validity of the application or any resulting registration, declares that the facts set forth in this

application are true; all statements made of his/her own knowledge are true; and all statements made on information and belief are believed to be true

Michael Keilbronne